

REFERENCE: Public Notice DA 03-3585
RM number: RM-10821

Office of the Secretary
Federal Communications Commission
445 12th St. SW, TW-35
Washington, DC 20554

Dear Office of the Secretary:

On behalf of the 550,000 members of the Boat Owners Association of The United States (BoatU.S.), we concur with and support the U.S. Coast Guard's position on the Maritel, Inc., Petition for Rulemaking Regarding the Use of Maritime VHF Channels 87B and 88B (Nov. 7, 2003).

We are very concerned about the loss of the last available internationally-interoperable and recreational-vessel interoperable VHF spectrum in the United States. While it may appear that the issue of AIS is of a commercial vessel nature, all mariners — including recreational boaters — could be negatively affected if the petition succeeds. These VHF channels are essential to port security and maritime safety and allowing a third party to control of and profit from is not in the best interest of the government, its citizens, or mariners.

Thank you for the opportunity to comment.

Sincerely,

Michael G. Sciulla
Vice President, Government and Public Affairs
Boat Owners Association of The United States

CC: Qualex International, Inc., Portals II, 445 12th St., SW, Room CY-B402,
Washington DC 20554

Maria Ringold, FCC, Consumer and Governmental Affairs Bureau, Reference Information Center (RIC), 445 12th St. SW, Room CY-B529, Washington DC, 20554

Tim Maguire, FCC, Wireless Telecommunications Bureau, Public Safety and Private Wireless Division, 445 12th St. SW, Room 4-C342, Washington DC, 20554

Jeffrey Tobias, FCC, Wireless Telecommunications Bureau, Public Safety and Private Wireless Division, 445 12th St. SW, Room 4-C828, Washington DC, 20554